

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 1:25-cv-20757-JB/Torres**

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

\_\_\_\_\_ /

**DECLARATION OF ANDREW B. BRETTLER**

I, Andrew B. Brettler, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned action. I am a partner at the law firm Berk Brettler LLP in West Hollywood, California. Along with our local counsel at Bilzin Sumberg Baena Price & Axelrod LLP, we represent Defendant Steven K. Bonnell II. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.

2. I submit this Declaration in opposition to Plaintiff's Motion for Protective Order Governing Discovery [ECF No. 82].

3. On May 14, 2025, Plaintiff's counsel, Joan Peters, emailed me a draft stipulated confidentiality agreement and protective order for consideration. Attached hereto as **Exhibit A** is a true a correct copy of the email and attachment that Ms. Peters sent me on May 14, 2025.

4. I reviewed Plaintiff's draft order and provided redlined comments and proposed revisions to Plaintiff's counsel by email on May 16, 2025. The proposed revisions omitted the protections that Plaintiff's counsel proposed to shield the identity of witnesses and/or potential

witnesses. Attached hereto as **Exhibit B** is a true and correct copy of my email and revised draft stipulated confidentiality agreement, dated May 16, 2025 at 11:06 a.m. PDT.

5. In response, at 1:55 p.m. PDT on May 16, 2025, Plaintiff's counsel acknowledged that while "witness identities [sic] are not inherently confidential," Plaintiff intended to proceed with her Motion for Protective Order. Attached hereto as **Exhibit C** is a true and correct copy of Ms. Peters' May 16, 2025 email to me.

6. A week later, on May 23, 2025, Plaintiff filed her Motion [ECF No. 82] attaching a different version of the draft order [ECF No. 82-1] than the one she shared with me on May 14.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 5, 2025.

s/ Andrew B. Brettler  
Andrew B. Brettler